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Attorneys for Defendants
WHOLE FOODS MARKET CALIFORNIA, INC. and
MRS. GOOCH'S NATURAL FOOD MARKETS,
INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARY GARRISON and GRACE
GARRISON, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

WHOLE FOODS MARKET CALIFORNIA,
INC., et al.,

Defendants.

Case No. 3:14-CV-00334-VC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR LIMITED
MODIFICATION TO SCHEDULING
ORDER**

Pursuant to Local Rule 6-1(b), Plaintiffs MARY GARRISON and GRACE GARRISON, individually, and on behalf of all others similarly situated (collectively "Plaintiffs"), on the one hand, and Defendants WHOLE FOODS MARKET CALIFORNIA, INC. and MRS. GOOCH'S NATURAL FOOD MARKETS, INC. (collectively "Defendants"), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on February 11, 2015, the Court entered a minute entry setting forth several case deadlines consistent with the Parties' most recent Joint Case Management Conference Statement, including the requirement that the Parties submit a stipulated ESI Protocol or letter

1 brief outlining any dispute regarding the ESI Protocol by March 3, 2015. (Dkt. 50.)

2 WHEREAS, on March 5, 2015, at the request of the Parties, the Court extended the
3 March 3, 2015 deadline to March 17, 2015.

4 WHEREAS, the Parties continue to confer on issues pertaining to the draft ESI Protocol
5 and desire additional time to attempt to resolve their dispute without resorting to intervention
6 from the Court.

7 WHEREAS, the additional time the Parties seek to attempt to reach agreement on an ESI
8 Protocol will not alter any other case deadlines.

9 IT IS THEREFORE STIPULATED that:

10 1. Instead of filing a stipulated ESI Protocol or joint letter brief to the Court on or
11 before March 17, 2015, the Parties shall submit a stipulated ESI Protocol on or before March 24,
12 2015 to the extent the Parties resolve their dispute and are able to reach an agreement by that
13 time.

14 2. To the extent the Parties have not reached an agreement as to an ESI Protocol by
15 that time, the Parties shall provide an update on the progress of their efforts to the Court in their
16 updated Joint Case Management Conference Statement due to be filed on March 24, 2015, with a
17 proposed schedule for resolving the dispute.

18 3. All other deadlines remain unchanged.

19 IT IS SO STIPULATED.

20 DATED: March 16, 2015

SEYFARTH SHAW LLP

21 By: /s/ Joseph J. Orzano

22 Jay W. Connolly
23 Giovanna A. Ferrari
24 Joseph J. Orzano

25 Attorneys for Defendants
26 WHOLE FOODS MARKET CALIFORNIA,
27 INC. and MRS. GOOCH'S NATURAL FOOD
28 MARKETS, INC.

1 DATED: March 16, 2015

SCOTT COLE & ASSOCIATES, APC

2 By: /s/ Molly A. Desario

3 Matthew R. Bainer

4 Molly a. DeSario

5 Attorneys for Plaintiffs

MARY GARRISON and GRACE

6 GARRISON, individually and on behalf of all
other similarly situated

7
8 **[PROPOSED] ORDER**

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 1. Instead of filing a stipulated ESI Protocol or joint letter brief to the Court on or
11 before March 17, 2015, the Parties shall submit a stipulated ESI Protocol on or before March 24,
12 2015 to the extent the Parties resolve their dispute and are able to reach an agreement by that
13 time.

14 2. To the extent the Parties have not reached an agreement as to an ESI Protocol by
15 that time, the Parties shall provide an update to the Court in their updated Joint Case
16 Management Conference Statement due to be filed on March 24, 2015, with a proposed schedule
17 for resolving the dispute.

18 3. All other deadlines remain unchanged.

19
20 DATED: March 18, 2015



21 HON. VINCE CHHABRIA
22 United States District Court Judge

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